UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

RSA SECURITY LLC, Plaintiff

V.

ZIONS MANAGEMENT SERVICES COMPANY, AMEGY BANK, N.A., ZIONS FIRST NATIONAL BANK, and ZIONS BANCORPORATION, Defendants CASE NO. 12-CV-11975-TSH

MOTION TO FILE UNDER SEAL

The plaintiff, RSA Security LLC, moves for leave of Court to file under seal it's Memorandum in Support of Emergency Motion for a Preliminary Injunction along with a supporting Affidavit. Information contained in the Memorandum and Affidavit is confidential pursuant to a contractual provision in the License Agreement that is the subject of this case and pursuant to a protective order stipulated by all parties to an arbitration pending in California. Therefore, RSA Security respectfully requests that the Court allow it to file under seal.

RSA SECURITY LLC

By its attorneys,

/s/ John T. McInnes

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Dated: October 26, 2012

CERTIFICATE OF SERVICE

I, John T. McInnes, hereby certify that this document(s), filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on October 26, 2012.

/s/ John T. McInnes

John T. McInnes, Esq.